

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION

X CORP.,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	No. 7:24-cv-00114-B
	§	
WORLD FEDERATION OF ADVERTISERS;	§	
MARS, INCORPORATED;	§	
CVS HEALTH CORPORATION;	§	
ØRSTED A/S;	§	
TWITCH INTERACTIVE, INC.	§	
NESTLÉ S.A.; NESTLE USA, INC.;	§	
ABBOTT LABORATORIES;	§	
COLGATE-PALMOLIVE COMPANY;	§	
LEGO A/S; LEGO BRAND RETAIL, INC.;	§	
PINTEREST, INC.;	§	
TYSON FOODS, INC.;	§	
SHELL PLC; SHELL USA, INC.; AND	§	
SHELL BRANDS INTERNATIONAL AG,	§	
	§	
<i>Defendants.</i>	§	

**DEFENDANT LEGO A/S'S MOTION TO DISMISS  
FOR LACK OF PERSONAL JURISDICTION**

Pursuant to Federal Rule of Civil Procedure 12(b)(2), Defendant LEGO A/S, by its attorneys, respectfully moves this Court to dismiss Plaintiff X Corp.'s Complaint for lack of personal jurisdiction over LEGO A/S.<sup>1</sup>

As set forth in the accompanying Brief in Support and Appendix, this Court lacks personal jurisdiction over LEGO A/S, under both the Texas long-arm statute and Section 12 of

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<sup>1</sup> Plaintiff's claims cannot proceed in this Court against Lego A/S because it is not subject to personal jurisdiction in Texas. But, even if this Court finds otherwise, this suit cannot proceed because Plaintiff fails to state a claim, as demonstrated in the concurrently-filed Motion to Dismiss for Failure to State a Claim, which Lego A/S joins subject to and without waiving its jurisdictional objections.

the Clayton Act, 15 U.S.C. § 22. LEGO A/S is a Danish corporation with no meaningful ties to Texas or the United States and has undertaken no actions connected to X Corp.'s claims in Texas or the United States. Because X Corp.'s Complaint is devoid of any plausible allegations establishing that LEGO A/S has the necessary minimum contacts required to authorize personal jurisdiction, there is no legal basis for this Court to exercise personal jurisdiction over LEGO A/S. For the reasons set forth above and more fully in the accompanying Brief in Support and Appendix, LEGO A/S respectfully requests that this Court dismiss LEGO A/S from this lawsuit.

Dated: May 14, 2025

Respectfully submitted,

By:

/s/ Minoo Blaesche

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**CERTIFICATE OF SERVICE**

The undersigned Counsel hereby certifies that on this 14th day of May 2025, notice of the foregoing pleading was provided via the CM/ECF system to the counsel of record.

*/s/ Minoo Blaesche*

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Minoo Blaesche

*Attorney for LEGO A/S*